



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
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phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsitel@jsitel.com

June 23, 2015

ACCEPTED/FILED

JUN 23 2015

Federal Communications Commission
Office of the Secretary

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

SECRET FILE COPY ORIGINAL

Re: WC Docket No. 14-58
2015 ETC Annual Report of West Kentucky Rural Telephone Coop. Corp.,
Inc. (KY)
Study Area Code 260421

Dear Ms. Dortch:

On behalf of West Kentucky Rural Telephone Coop. Corp, Inc. ("Company"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) of its Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd
List ABCDE

0+3

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of West Kentucky Rural Telephone Coop. Corp.,
Inc. (KY)
Study Area Code 260421
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client West Kentucky Rural Telephone Coop. Corp., Inc. (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")⁴ and must also report outages, both of which are contained in attachments to the 2015 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

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phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

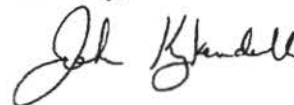
⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

Federal Communications Commission
Office of the Secretary

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input type="text"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	<div style="border: 1px solid black; height: 60px; width: 400px;"></div>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<320>	Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 60px; width: 400px;"></div>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		(attach descriptive document)		
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	<input type="text" value="0.1636"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	<input type="text" value="0.1178"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<div style="border: 1px solid black; padding: 5px;">260421KY510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<div style="border: 1px solid black; padding: 5px;">260421KY610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification	<input type="text" value="Yes"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	<div style="border: 1px solid black; height: 60px; width: 400px;"></div>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	<input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>		(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tsavcs.com

<110> Has your company received its ETC certification from the FCC? (yes / no) ☐ ☒

If your answer to Line <110> is yes, do you have an existing §54.202(a) "5

<111> year plan" filed with the FCC? (yes / no) ☐ ☐

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

260421kY112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets
<114>	Report how much universal service (USF) support was received
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	260421
-------	-----------------	--------

<015>	Study Area Name	WEST KENTUCKY RURAL
-------	-----------------	---------------------

<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
-------	---	---------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
-------	---	-----------------

<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmavcs.com
-------	---	----------------------

<220> <a> <b1> <b2> <b3> <b4> <c1> <c2> <d> <e> <f> <g> <h>

[illegible]

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(700) Price Offerings including Voice Rate Data
Data Collection Form

OSHA Form 3060-0005, OSHA Control No. 3060-0019

010	Study Area Code	260421
-----	-----------------	--------

<015>	Study Area Name	WEST KENTUCKY RURAL
-------	-----------------	---------------------

<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
-------	---	---------------

<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
-------	---	-----------------

<039> Contact Email Address - Email Address of person identified in data line <030> tcrandall@tmavcs.com

<701> Residential Local Service Charge Effective Date	1/1/2015
---	----------

<702> Single State-wide Residential Local Service Charge	16.0
--	------

<703>

[illegible]

Call 1-800-854-6622 for more information.

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@maivo.com

[illegible]

Case No. 3060-0816 / OAS Control No. 3060-0819

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmavcs.com
<810>	Reporting Carrier	West Kentucky Rural Telephone Cooperative Corporation, Inc.
<811>	Holding Company	Not Applicable
<812>	Operating Company	West Kentucky Rural Telephone Cooperative Corporation, Inc.

[illegible]

Doc. No. 3050-0819 / OAS Control No. 3050-0819

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tsavcs.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

[illegible]

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

2016-2017 CMIS Control No. 2060-0819

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmvca.com

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FLD Form 101
 OMB Control No. 3060-0586/OMB Control No. 3060-0819
 09/2013

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@mavca.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP <http://wktelecom.coop/voice/another-voice-sub/>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2008) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

Form No. 100-1000, OASD Control No. 3000-0513
10/05/13

<010>	Study Area Code	260421
<015>	Study Area Name	WEST KENTUCKY RURAL
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	ROD CRANDALL
<035>	Contact Telephone Number - Number of person identified in data line <030>	2708563983 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	RCRANDALL@CHSVCB.COM

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
 <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
 <2011b> Attachment (47 CFR § 54.313(b)(1)ii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
 <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
 <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
 <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification
 <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate of Return Carrier Additional Documentation
Data Collection Form

<010> Study Area Code 260421
<015> Study Area Name WEST KENTUCKY RURAL
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data Todd Cranda11
<035> Contact Telephone Number - Number of person identified in data line <030> 270856283 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> tcranda11@tscvcb.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 3 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(ii))
260421KY3010.pdf

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.
☒

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))
260421KY3012.pdf

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
(3014) If yes, does your company file the RUS annual report
88

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☒
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation
260421KY3017.pdf

(3018) If the response is no on line 3014, is your company audited?
If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains
Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3019) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3020) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit
If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3021) Copy of their financial statement which has been subject to review by an independent certified public accountant or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.

(3022) Underlying information subjected to a review by an independent certified public accountant

(3023) Underlying information subjected to an officer certification.
(3024) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3025) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation (Continued)**Data Collection Form**

<010> Study Area Code	260421
<015> Study Area Name	WEST KENTUCKY RURAL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035> Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

REDACTED FOR PUBLIC INSPECTION

Certification - Reporting Carrier Data Collection Form	EEO Form 400 Civil Control Act - 50 USC 5030(b)(2) General Reg. 3000-0410 July 2013
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<010> Study Area Code	260421
<015> Study Area Name	WEST KENTUCKY RURAL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035> Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmavcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier	Form 1000-1	Form 1000-1
Date Collection Form	Form 1000-1	Form 1000-1

<010> Study Area Code	260421
<015> Study Area Name	WEST KENTUCKY RURAL
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Todd Crandall
<035> Contact Telephone Number - Number of person identified in data line <030>	2708569983 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmsvcs.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Tanea Davis Foglia</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Tanea Davis Foglia
Name of Reporting Carrier:	WEST KENTUCKY RURAL
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/22/2015
Printed name of Authorized Officer:	Todd Crandall
Title or position of Authorized Officer:	Chief Financial Officer
Telephone number of Authorized Officer:	2708569983 ext.
Study Area Code of Reporting Carrier:	260421 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	WEST KENTUCKY RURAL
Name of Authorized Agent or Employee of Agent:	Tanea Davis Foglia
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/19/2015
Printed name of Authorized Agent or Employee of Agent:	Tanea Davis Foglia
Title or position of Authorized Agent or Employee of Agent:	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	260421 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

West Kentucky Rural Telephone Cooperative Corporation, Inc.

Line 510

West Kentucky Rural Telephone Cooperative Corporation, Inc.'s demonstration of complying with applicable service quality standards and consumer protection rules for voice and broadband services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers."² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement" and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."⁴

West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky") hereby certifies that it is in compliance with applicable service quality standards and consumer protection rules. West Kentucky is subject to consumer protection obligations under the Kentucky Revised Statutes (KRS) and Kentucky Administrative Regulations (KAR). These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of KRS Chapter 278.541 to 278.544 and 807 KAR 5:011, which disclose rates, terms and conditions of service to customers; (2) adherence to Kentucky state consumer protection requirements governing telephone providers which include Consumer protections as identified in

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: "(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy." *Id.* at n. 71.

⁴ *Id.* at n. 72.

West Kentucky Rural Telephone Cooperative Corporation, Inc.

Line 510

KRS Chapter 278.546, Pricing Procedures as illustrated in KRS Chapter 278.542(1), and Compliance with Anti-Slamming Procedures as adopted in KRS Chapter 278.535; (3) truth-in-billing requirements as required in 807 KAR 5:061, Section 13; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy. Additionally, incumbent local exchange carriers are required by 807 KAR 5:061, Section 4(4) to maintain records of and report monthly various service objectives related to the Provision of Service, 807 KAR 5:061, Section 10(1); Dial Service Requirements, 807 KAR 5:061, Section 15(1) and (2); Answering Time, 807 KAR 5:061, Section 22(1) and (2) and Service Interruption, 807 KAR 5:061, Section 25(3) and (4).

West Kentucky is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in 47 CFR § 8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

West Kentucky Rural Telephone Cooperative Corporation, Inc.

Line 610

West Kentucky Rural Telephone Cooperative Corporation's demonstration of ability to function in emergency situations for voice and broadband services:

West Kentucky Rural Telephone Cooperative Corporation, Inc. ("West Kentucky") hereby certifies that it is able to function in emergency situations as set forth in 47 C.F.R. § 54.202(a)(2)¹ and the Kentucky Administrative Regulations (KAR), 807 5:061, Section 24. West Kentucky's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). West Kentucky can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow West Kentucky to manage traffic spikes throughout its network, as emergency situations require. In addition, West Kentucky has redundancy for connectivity purposes *via* additional routes and electronic equipment for voice and broadband services.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. West Kentucky has battery backup at all office locations and in its electronic equipment sites. Length of run time is determined by the equipment serving the area and the number of customers working out of the equipment. Generators are installed at all Central Office locations. They will continue to run as long as West Kentucky has access to fuel.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

REDACTED FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	260421
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<015>	Study Area Name	WEST KENTUCKY RURAL
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<020>	Program Year	2016
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<030>	Contact Name - Person USAC should contact regarding this data	Todd Crandall
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<035> Contact Telephone Number - Number of person identified in data line <030> 2708569983 ext.

<039>	Contact Email Address - Email Address of person identified in data line <030>	tcrandall@tmavca.com
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<220>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(700) Price Offerings Including Voice Rate Data
Data Collection Form

PGT Form 482
OMB Control No. 3060-0088/OMB Control No. 3060-0819
July 2011

<010> Study Area Code 260421
<015> Study Area Name WEST KENTUCKY RURAL
<020> Program Year 2016
<030> Contact Name - Person USAC should contact regarding this data Todd Crandall
<035> Contact Telephone Number - Number of person identified in data line <030> 2708569983 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> tcrandall@mavca.com

<701> Residential Local Service Charge Effective Date 1/1/2015
<702> Single State-wide Residential Local Service Charge 16.0

<703>

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
KY	Sedalia (270-328)		FR	16.0	0.0	0.0	0.0	16.0
KY	Farmington (270-345)		FR	16.0	0.0	0.0	0.0	16.0
KY	Fairdealing (270-354)		FR	16.0	0.0	0.0	0.0	16.0
KY	Wingo (270-376)		FR	16.0	0.0	0.0	0.0	16.0
KY	Lynnville (270-382)		FR	16.0	0.0	0.0	0.0	16.0
KY	Lynn Grove (270-435)		FR	16.0	0.0	0.0	0.0	16.0
KY	New Concord (270-436)		FR	16.0	0.0	0.0	0.0	16.0
KY	Hardin (270-437)		FR	16.0	0.0	0.0	0.0	16.0
KY	Kirksey (270-489)		FR	16.0	0.0	0.0	0.0	16.0
KY	Hazel (270-492)		FR	16.0	0.0	0.0	0.0	16.0
KY	Pancy Farm (270-623)		FR	16.0	0.0	0.0	0.0	16.0
KY	Cunningham (270-642)		FR	16.0	0.0	0.0	0.0	16.0
KY	West Plains (270-658)		FR	16.0	0.0	0.0	0.0	16.0
KY	Lowes (270-674)		FR	16.0	0.0	0.0	0.0	16.0
KY	Polsomdale (270-856)		FR	16.0	0.0	0.0	0.0	16.0
TN	South Hazel (731-498)		FR	16.0	0.0	0.0	0.0	16.0
TN	Cypress (731-232)		FR	16.0	0.0	0.0	0.0	16.0
TN	Puryear (731-247)		FR	16.0	0.0	0.0	0.0	16.0
TN	Cottage Grove (731-782)		FR	16.0	0.0	0.0	0.0	16.0